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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DR. ANDREW FORREST,

 Plaintiff,

 v.

 META PLATFORMS, INC.

 Defendant.

Case No. 22-CV-03699-PCP (VKD)

**DECLARATION OF JOHN C.
 QUINN IN SUPPORT OF
 PLAINTIFF ANDREW FORREST'S
 ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER ANOTHER
 PARTY'S MATERIAL SHOULD BE
 SEALED**

The Honorable Virginia K. DeMarchi

1 I, John C. Quinn, declare as follows:

2 1. I am a partner with the law firm Hecker Fink LLP, counsel of record for Plaintiff
3 Dr. Andrew Forrest in this action. I make this declaration based on my own personal knowledge.

4 2. Attached are true and correct copies of the parties' Joint Discovery Letter Brief
5 ("Letter Brief") and the proposed discovery requests at issue, Plaintiff's First Set of Requests for
6 Admission.

7 3. Page 6 of the Letter Brief contains material designated by Defendant Meta
8 Platforms, Inc. as "CONFIDENTIAL" Protected Material pursuant to the Second Amended
9 Protective Order ("Protective Order") entered in this matter. *See* ECF 234. Those portions are
10 highlighted in the attached copy.

11 4. Pages 6-14 of Plaintiff's First Set of Requests for Admission contain material
12 designated by Defendant as "CONFIDENTIAL" Protected Material pursuant to the Protective
13 Order. Those portions are highlighted in the attached copy.

14 5. Pursuant to Section 14.4 of the Protective Order, "[w]ithout written permission
15 from the Designating Party or a court order . . . , a Party may not file in the public record in this
16 action any Protected Material." *Id.* ¶ 14.4.

17 6. Consistent with the Protective Order, Plaintiff has conditionally redacted the
18 highlighted material from the publicly filed versions of the Letter Brief and Plaintiff's First Set of
19 Requests for Admission.

20 I declare under the penalty of perjury that the foregoing is true and correct.
21

22 Dated: November 24, 2025

/s/ John C. Quinn

23 New York, New York

John C. Quinn